



Clean Harbors Environmental Services, Inc.
2247 South Highway 71
Kimball, Nebraska 69145
308.235.4012
www.cleanharbors.com



Sent via FedEx

September 2, 2015

Ms. Dedriel Newsome
U.S. Environmental Protection Agency, Region VII
300 Minnesota Avenue
Kansas City, KS 66101

Re: August 18th – August 19th, 2014 EPA Inspection
EPA ID Number: NED981723513

Dear Mr. Tucker;

The purpose of this letter is to respond to the Notice of Violation dated August 19, 2014 (see Attachment One). Those alleged violations are listed below followed by the Clean Harbors Environmental Services, Inc. (CHESI) response.

Violation 1a – Ch 10.004.01A2 and Permit Condition III.F.1 – 2 open <90 day storage containers (90 day Area B and Area C)

CHESI Response: Action to close the containers was taken during the EPA inspection to fix the tarp in the 90 day Area C. A retraining document on container management procedures has been issued to all involved employees to prevent similar issues in the future.

Violation 1b – Ch 10.004.01A2 and Permit Condition III.F.1 – 2 open permitted storage containers (Area 57C and Area 50A)

CHESI Response: Action to close the containers was taken during the EPA inspection to fix both containers. A retraining document on container management procedures has been issued to all involved employees to prevent similar issues in the future. Figure 1 shows the picture of the cardboard box in indoor sorting Area 57C that was re-secured during the inspection. At the time of finding the box it was taped down in front of EPA Inspectors. The tarp that was collapsed due to heavy rains was also fixed upon finding the slipped tarp on the box in Area 50A in front of EPA Inspectors.

Violation 2 – Permit Condition III.D. – 5 containers not in good condition (#46042711, #46322745, #44825540, #45670737, and #46443184)

CHESI Response:
#46042711 - The suction of this bucket was released on August 18, 2015. This drum was shipped to Clean Harbors El Dorado, LLC for disposal on August 31, 2015. Figure. 2 shows this bucket with the suction released.



#46322745 - The suction of this bucket was released on August 18, 2015. This drum was shipped to Clean Harbors El Dorado, LLC on August 31, 2015.

#44825540 – The tear in this box was fixed on August 18, 2015. Please see Figure 3 for a picture of this fixed box.

#45670737 – This drum was overpacked on August 18, 2015. CHESI does not believe that this container had a structural defect that affected the integrity of the container. Please see Figure 4 for a picture of the overpacked drum.

#46443184 – The suction of this drum was released on August 18, 2015. This drum was shredded in Area 55 on August 22, 2015.

Clean Harbors believes that the large fluctuations in temperature between cold nights and hot days caused the pails to concave. The box was inadvertently torn by a piece of equipment. All employees in the warehouse have been reminded of the obligations to ensure proper container integrity to prevent reoccurrence of these issues.

Violation 3a – Cracks/gap in containment and not impermeable, Permit Condition III.J.1 – Area 25 – pocks in pad

CHESI Response: The pocks noted in the base of the containment system of Area 25 are surface imperfections. With 12 inches of coated concrete, the secondary containment system of Area 25 is sufficiently impervious to contain leaks, spills and accumulated precipitation.

Violation 3b – Cracks/gap in containment and not impermeable, Permit Condition IV.D.6 – Area 58 – cracks/peeling in floor and cracks in wall

CHESI Response: The mark on the base of the containment system was a surface imperfection. The imperfection has been fixed with Work Order #031401 as a best management practice. The hairline imperfections in the walls of the containment were also surface imperfections. With the imperfections the containment was sufficiently containing leaks, spills and accumulated precipitation. Work Orders #031396, # 031397, #031398, and #031400 were completed.

Violation 3c – Cracks/gap in containment and not impermeable, Permit Condition IV.D.6 – Area 70 – cracks/no coating near T-118, T-110 and T-360

CHESI Response: Clean Harbors has a systematic process to identify issues during inspections, create work orders and then systematically track corrections until the issues are resolved. Please see completed Work Orders #031393, #031543 and #031544.

Violation 3d – Cracks/gap in containment and not impermeable, Permit Condition IV.D.6 – Direct Feed south wall cracks

CHESI Response: The hairline imperfections in the walls of the containment were surface imperfections. With the imperfections the containment was sufficiently containing leaks, spills and accumulated precipitation. Work Order #031394 was completed.



Violation 3e – Cracks/gap in containment and not impermeable, Permit Condition III.J.1 – Area 95 – concrete spalling

CHESI Response: Clean Harbors has a systematic process to identify issues during inspections, create work orders and then systematically track corrections until the issues are resolved. Please find the attached Work Order 031316 that was submitted on 8-4-15 for Area 95 slot 31.

Violation 4 – 40 CFR 264.15 (c) and Permit Condition II.F.1. – Area 58 – cracks in T-145 pedestals and rusting peeling tank

CHESI Response: The Area 58 tanks all passed the annual Ultrasonic Thickness Testing Requirements when tested in December 2014. The peeling of the tanks only reflects the quality of the superficial paint job not the integrity of the tanks. Tanks in Area 58 are supported by steel legs and the concrete like material noted in the inspection on the legs is fire coating. The fire coating provides no structural support for any of the tanks in this Area. However, based on Clean Harbors' safety standards, the slight defects in the fire coating will be repaired as seen on Work Order On September 1, 2015, Clean Harbors had a third party Nebraska Registered Professional Engineer re-inspect the integrity of the tanks in Area 58. This will be submitted to the EPA under a separate cover as soon as Clean Harbors receives the report.

Violation 5 – Permit Condition II.B. – Releases of Hazardous Waste Feed on Levels 6, 5 and 4 at Area 45.

CHESI Response: Upon discovering the spill of Hazardous Waste on Levels 6, 5 and 4 in Area 45 CHESI immediately cleaned up the spill. EPA inspectors witnessed the Areas being cleaned on August 18, 2015 and in a clean condition on August 19, 2015.

Violation 6 – Permit Condition IV.E.9. and IV.E. 8. – Area 55 and 50C not operated according to T-Test

CHESI Response: Area 55 and Area 50C are operated according to the T-Test however comments to this affect were not included on the T-Test form. On September 1 and 2, 2015, CHESI re-did the T-Tests for Area 55 and Area 50C respectively and those passed inspection forms are included in Attachment 4. This is an administrative oversight in how the T-Test form was completed and should not be considered a violation.

Violation 7 – Permit Condition IV.I. – No Subpart BB tags on TOU equipment at 8 locations.

CHESI Response: Clean Harbors has a robust program to tag and monitor Subpart BB regulated equipment. Tags were added to the missing 8 Subpart BB locations on August 18, 2015. EPA inspectors saw the re-tagged locations on August 19, 2015.

Violation 8 – Permit Condition II.D. – No detail for waste streams ID as “liquid”.

CHESI Response: The liquid that was referenced in profile CH1033000 was inert liquid. The SDS for this particular waste only references the hazardous constituents as explained to inspectors during the EPA Inspection. A copy of the SDS is attached in Appendix 5. The liquid referenced on the profile is inert liquid.



Violation 9 – Permit Condition III.F.2. – Unsecure pallet in Area 57D.

CHESI Response: The drums on the pallet in Area 57D were rearranged on August 18, 2015. Please see figure 5. A retraining document on container management procedures has been issued to all involved employees to correct similar issues in the future.

Concern – Cigarette Butts

CHESI Response: Clean Harbors is in the process of moving a smoking shelter into the space provided for smoking. This should help to eliminate the wind blowing in cigarette butts into the facility. Clean Harbors does not believe that anyone is smoking by the Area A 90 Day storage area.

Should you have any questions please feel free to contact the CHESI Compliance Manager, Jessica Grow, at 308-235-8260 or by email at grow.jessica@cleanharbors.com.

Sincerely,

A handwritten signature in blue ink that reads "Jared Hunsaker".

Jared Hunsaker
Facility General Manager
hunsakerj@cleanharbors.com



Attachment 1

Copy of Notice of Violation Pursuant to Requirements of the Resource
Conservation and Recovery Act (RCRA)

Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: Clean Harbors Env Svc
Address: 2247 S. Highway 71
Kimball, NE 68145
EPA ID Number: NE0981723513 Date: 8/18-19/15

This notice is provided to call your attention to the following areas of noncompliance with state and federal regulations. This notice does not constitute a compliance order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA and may not be a complete listing of all violations resulting from the the inspection.

Citation	Description of Violation
① CH10.004.01A2 and III.F.1	(a) 2 open < 90 day sty containers (90 day Area B and Area C)
② III.D	(b) 2 open permitted storage (Area 57C and 50A)
③	5 containers not in good condition (# 46042711, # 46322745, # 44825540, # 45670737, # 46443184)
	Cracks/gap in containment and not impermeable
(a) III.J.1	Area 25 - ponds in pond
(b) IV.D.6	Area 58 - crack/paving intrusion + cracks in wall
(c) IV.D.6	Area 70 - cracks/no covering near T118, T110 + T360
(d) IV.D.6	Direct Feed South well cracks
(e) III.J.1	Area 75 - cracked spillings
④ II.F.1 → 40 CFR 264.15(c)	Area 58 - cracks in T145 pedestal - rusting paving truck

You are requested to submit a written response within 14 calendar days of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U. S. Environmental Protection Agency, Region VII

ATTN. _____

If you have any questions about this Notice or wish to discuss your response, you may call me at _____, or _____ (Compliance Officer) at _____.

This Notice prepared by ASH

Date: 8/19/15

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: JH

Date: 8/19/2015

Signature: _____

Title: _____

Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: Clean Harbors
Address: _____

EPA ID Number: _____ Date: 8/18-19/15

This notice is provided to call your attention to the following areas of noncompliance with state and federal regulations. This notice does not constitute a compliance order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA and may not be a complete listing of all violations resulting from the the inspection.

<u>Citation</u>	<u>Description of Violation</u>
⑤ II.B	Releases (dark stains) of bleed SS ^{oil} west over north of HW feed on Levels 6, 5 & 4 at Area 45
④ IV.E. 9 and E.8	Area SS and SOC not operated according to T-Test
⑦ VI.1	No Sub BD tags on TOL equipment at 8 locations
⑥ II.D	No detail for waste streams ID 95 "liquid"
① II.F.2	Unsecured pallet in STD

You are requested to submit a written response within 14 calendar days of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U. S. Environmental Protection Agency, Region VII
300 Minnesota Ave
Kansas City, KS 66101
ATTN: Dedrick Newsome

If you have any questions about this Notice or wish to discuss your response, you may call me at
913 551 7049, or Ed Buckner (Compliance Officer) at
913 551 7621.

This Notice prepared by Dedrick Newsome Date: 8/19/15

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: Jared Hunsaker Date: 8/19/2015
Signature: Jared Hunsaker
Title: GM



Attachment 2

Figures



Figure 1: Taped box in Area 57C (Violation 1b)

"People and Technology Creating a Better Environment"



Figure 2: Suction Released from #46042711

"People and Technology Creating a Better Environment"

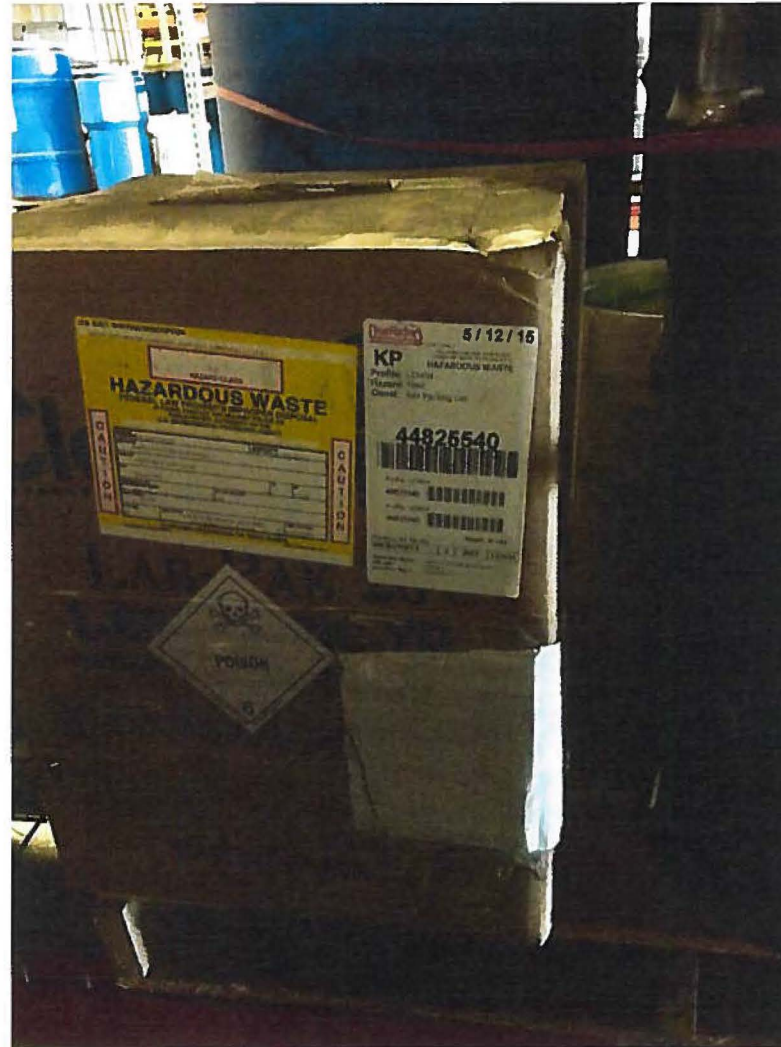


Figure 3: Torn Box #45670737

“People and Technology Creating a Better Environment”



Figure 4: Overpacked drum #45670737



Figure 5: Rearranged Pallet in Area 57D

“People and Technology Creating a Better Environment”



Attachment 3

Work Orders

WORK ORDER

Page: 1

CLEAN HARBORS - KIMBALL, NE

WO: 031401 **Account:** **Project:** **Status:** F

Submitted By:	MIKE SIDELL	Phone:	
Contact:		Phone:	
Date,Time:	08/18/15,13:49	Required:	08/19/15
Type:	R	Dispatched To:	
Priority:	1	Rating:	9
Failure:		Action:	
Est Down:		Downtime:	
OS Date,Time:		RS Date,Time:	
Charge Code:	COM-L	COMPLIANCE LABOR	
Safety Procs:		PM Desc:	

EQUIPMENT INFORMATION

Equipment:	BLDG-58	TANK FARM AND OFFLOAD BAY AREA-58
Eqp Hier:	BLDG-58	Serial #:
Location:		Model #:
Keyword:	BUILDING-58, ALL BUILDINGS IN AREA 58	Manufacturer:

PROBLEM DESCRIPTION

The floor between T-146 and T-143 has a hole in coating. Please seal and spot is marked in black.

COMMENTS

Prepped and cleaned area, applied coating.

AUTHORIZATION/COMPLETION INFORMATION

Authorized By:	Ken Redding	Authorized:	08/18/15
Planned By:		Planned:	
Completed By:	Maintenance	Completed:	08/20/15

WORK ORDER

Page: 1

CLEAN HARBORS - KIMBALL, NE

WO: 031396 **Account:** **Project:** **Status:** F

Submitted By:	MIKE SIDELL	Phone:	
Contact:		Phone:	
Date,Time:	08/18/15,13:42	Required:	08/19/15
Type:	R	Dispatched To:	
Priority:	1	Rating:	9
Failure:		Action:	
Est Down:		Downtime:	
OS Date,Time:		RS Date,Time:	
Charge Code:	COM-L	COMPLIANCE LABOR	
Safety Procs:		PM Desc:	

EQUIPMENT INFORMATION

Equipment:	BLDG-58	TANK FARM AND OFFLOAD BAY AREA-58
Eqp Hier:	BLDG-58	Serial #:
Location:		Model #:
Keyword:	BUILDING-58, ALL BUILDINGS IN AREA 58	Manufacturer:

PROBLEM DESCRIPTION

The West wall of tank farm has 5 cracks in it. Please seal and cracks are marked in black.

COMMENTS

Prepped and cleaned area, applied coating.

AUTHORIZATION/COMPLETION INFORMATION

Authorized By:	Ken Redding	Authorized:	08/18/15
Planned By:		Planned:	
Completed By:	Maintenance	Completed:	08/20/15

WORK ORDER

Page: 1

CLEAN HARBORS - KIMBALL, NE

WO: 031397 **Account:** **Project:** **Status:** F

Submitted By:	MIKE SIDELL	Phone:	
Contact:		Phone:	
Date,Time:	08/18/15,13:44	Required:	08/19/15
Type:	R	Dispatched To:	
Priority:	1	Rating:	9
Failure:		Action:	
Est Down:		Downtime:	
OS Date,Time:		RS Date,Time:	
Charge Code:	COM-L	COMPLIANCE LABOR	
Safety Procs:		PM Desc:	

EQUIPMENT INFORMATION

Equipment:	BLDG-58	TANK FARM AND OFFLOAD BAY AREA-58
Eqp Hier:	BLDG-58	Serial #:
Location:		Model #:
Keyword:	BUILDING-58, ALL BUILDINGS IN AREA 58	Manufacturer:

PROBLEM DESCRIPTION

The North wall has 2 cracks in it. Please seal and cracks are marked in black.

COMMENTS

Prepped and cleaned area, applied coating.

AUTHORIZATION/COMPLETION INFORMATION

Authorized By:	Ken Redding	Authorized:	08/18/15
Planned By:		Planned:	
Completed By:	Maintenance	Completed:	08/20/15

WORK ORDER

Page: 1

CLEAN HARBORS - KIMBALL, NE

WO: 031398 **Account:** **Project:** **Status:** F

Submitted By:	MIKE SIDELL	Phone:	
Contact:		Phone:	
Date,Time:	08/18/15,13:45	Required:	08/19/15
Type:	R	Dispatched To:	
Priority:	1	Rating:	9
Failure:		Action:	
Est Down:		Downtime:	
OS Date,Time:		RS Date,Time:	
Charge Code:	COM-L	COMPLIANCE LABOR	
Safety Procs:		PM Desc:	

EQUIPMENT INFORMATION

Equipment:	BLDG-58	TANK FARM AND OFFLOAD BAY AREA-58
Eqp Hier:	BLDG-58	Serial #:
Location:		Model #:
Keyword:	BUILDING-58, ALL BUILDINGS IN AREA 58	Manufacturer:

PROBLEM DESCRIPTION

The East wall has 4 cracks in it. Please seal and cracks are marked in black.

COMMENTS

Prepped and cleaned area, applied coating.

AUTHORIZATION/COMPLETION INFORMATION

Authorized By:	Ken Redding	Authorized:	08/18/15
Planned By:		Planned:	
Completed By:	Maintenance	Completed:	08/21/15

WORK ORDER

Page: 1

CLEAN HARBORS - KIMBALL, NE

WO: 031400**Account:****Project:****Status:** F

Submitted By: MIKE SIDELL
Contact:
Date,Time: 08/18/15,13:47
Type: R
Priority: 1
Failure:
Est Down:
OS Date,Time:
Charge Code: COM-L
Safety Procs:

Phone:
Phone:
Required: 08/19/15
Dispatched To:
Rating: 9
Action:
Downtime:
RS Date,Time:
COMPLIANCE LABOR
PM Desc:

EQUIPMENT INFORMATION

Equipment: BLDG-58
Eqp Hier: BLDG-58
Location:
Keyword: BUILDING-58, ALL BUILDINGS IN
AREA 58

TANK FARM AND OFFLOAD BAY AREA-58
Serial #:
Model #:
Manufacturer:

PROBLEM DESCRIPTION

The South wall has 1 crack in it. Please seal and crack is marked in black.

COMMENTS

Prepped and cleaned area, applied coating.

AUTHORIZATION/COMPLETION INFORMATION

Authorized By: Ken Redding
Planned By:
Completed By: Maintenance

Authorized: 08/18/15
Planned:
Completed: 08/20/15

WORK ORDER

Page: 1

CLEAN HARBORS - KIMBALL, NE

WO: 031393 **Account:** **Project:** **Status:** F

Submitted By:	James Culek	Phone:	
Contact:		Phone:	
Date,Time:	08/18/15,13:08	Required:	08/19/15
Type:	R	Dispatched To:	
Priority:	1	Rating:	9
Failure:		Action:	
Est Down:		Downtime:	
OS Date,Time:		RS Date,Time:	
Charge Code:	INSPECT	INSPECTION LABOR	
Safety Procs:		PM Desc:	

EQUIPMENT INFORMATION

Equipment:	CC70-VS6	VISCOUS STORAGE SECTION 6
Eqp Hier:	CC70-VS6	Serial #:
Location:		Model #:
Keyword:	BUILDING-70, ALL BUILDINGS IN AREA 70	Manufacturer:

PROBLEM DESCRIPTION

The coating around P-115 concrete base has cracks

COMMENTS

Chipped off old machinery grout, prepped and cleaned pump base, applied coating.

AUTHORIZATION/COMPLETION INFORMATION

Authorized By:	Ken Redding	Authorized:	08/18/15
Planned By:		Planned:	
Completed By:	Maintenance	Completed:	08/26/15

WORK ORDER REPRINT

Page: 1

CLEAN HARBORS - KIMBALL, NE

WO: 031543 **Account:** **Project:** **Status:** F

Submitted By:	Scott Smith	Phone:	
Contact:		Phone:	
Date,Time:	09/01/15,15:46	Required:	09/02/15
Type:	R	Dispatched To:	
Priority:	1	Rating:	9
Failure:		Action:	
Est Down:		Downtime:	
OS Date,Time:		RS Date,Time:	
Charge Code:	COM-L	COMPLIANCE LABOR	
Safety Procs:		PM Desc:	

EQUIPMENT INFORMATION

Equipment:	CC70-NVS3	NON-VISCOUS STORAGE SECTION 3
Eqp Hier:	CC70-NVS3	Serial #:
Location:		Model #:
Keyword:	BUILDING-70, ALL BUILDINGS IN AREA 70	Manufacturer:

PROBLEM DESCRIPTION

The Floor Coating is cracked on the Pedal Base HL1 and HL2

COMMENTS

Prepped and cleaned area, applied coating

AUTHORIZATION/COMPLETION INFORMATION

Authorized By:	Ken Redding	Authorized:	09/02/15
Planned By:		Planned:	
Completed By:	Maintenance	Completed:	09/02/15

WORK ORDER REPRINT

Page: 1

CLEAN HARBORS - KIMBALL, NE

WO: 031544 **Account:** **Project:** **Status:** F

Submitted By:	Scott Smith	Phone:	
Contact:		Phone:	
Date,Time:	09/01/15,16:01	Required:	09/02/15
Type:	R	Dispatched To:	
Priority:	1	Rating:	9
Failure:		Action:	
Est Down:		Downtime:	
OS Date,Time:		RS Date,Time:	
Charge Code:	COM-L	COMPLIANCE LABOR	
Safety Procs:		PM Desc:	

EQUIPMENT INFORMATION

Equipment:	CC70-VC2	VISCOUS CONTAINMENT SECTION 2
Eqp Hier:	CC70-VC2	Serial #:
Location:		Model #:
Keyword:	BUILDING-70, ALL BUILDINGS IN AREA 70	Manufacturer:

PROBLEM DESCRIPTION

The North East Tank Pedastal on T-361. The Floor Coating is Cracked

COMMENTS

Prepped and cleaned area, applied coating.

AUTHORIZATION/COMPLETION INFORMATION

Authorized By:	Ken Redding	Authorized:	09/02/15
Planned By:		Planned:	
Completed By:	Maintenance	Completed:	09/02/15

WORK ORDER

Page: 1

CLEAN HARBORS - KIMBALL, NE

WO: 031394 **Account:** **Project:** **Status:** F

Submitted By:	James Culek	Phone:	
Contact:		Phone:	
Date,Time:	08/18/15,13:15	Required:	08/19/15
Type:	R	Dispatched To:	
Priority:	1	Rating:	9
Failure:		Action:	
Est Down:		Downtime:	
OS Date,Time:		RS Date,Time:	
Charge Code:	INSPECT	INSPECTION LABOR	
Safety Procs:		PM Desc:	

EQUIPMENT INFORMATION

Equipment:	BLDG-70	BUILDINGS IN AREA 70
Eqp Hier:	BLDG-70	Serial #:
Location:	TANK FARM	Model #:
Keyword:	BUILDING-70, ALL BUILDINGS IN AREA 70	Manufacturer:

PROBLEM DESCRIPTION

The coating in Direct Feeds has cracks on the walls.

COMMENTS

Prepped and cleaned area, applied coating.

AUTHORIZATION/COMPLETION INFORMATION

Authorized By:	Ken Redding	Authorized:	08/18/15
Planned By:		Planned:	
Completed By:	Maintenance	Completed:	08/20/15

WORK ORDER REPRINT

Page: 1

CLEAN HARBORS - KIMBALL, NE

WO: 031316 **Account:** **Project:** **Status:** F

Submitted By:	MIKE SIDELL	Phone:	
Contact:		Phone:	
Date,Time:	08/04/15,10:00	Required:	08/05/15
Type:	R	Dispatched To:	
Priority:	1	Rating:	9
Failure:		Action:	
Est Down:		Downtime:	
OS Date,Time:		RS Date,Time:	
Charge Code:	COM-L	COMPLIANCE LABOR	
Safety Procs:		PM Desc:	

EQUIPMENT INFORMATION

Equipment:	BLDG-95	STORAGE PAD
Eqp Hier:	BLDG-95	Serial #:
Location:	ROLL-OFF STORAGE	Model #:
Keyword:	BUILDING-95, ALL BUILDINGS IN AREA 95	Manufacturer:

PROBLEM DESCRIPTION

Recoat and reseal 95-31

COMMENTS

Prepped and cleaned area, applied sealant.

AUTHORIZATION/COMPLETION INFORMATION

Authorized By:	Ken Redding	Authorized:	08/04/15
Planned By:		Planned:	
Completed By:	Maintenance	Completed:	08/31/15

WORK ORDER

Page: 1

CLEAN HARBORS - KIMBALL, NE

WO: 031553 **Account:** **Project:** **Status:** I

Submitted By:	DOUG MOENCH	Phone:	
Contact:		Phone:	
Date,Time:	09/02/15,09:27	Required:	09/03/15
Type:	R	Dispatched To:	
Priority:	1	Rating:	9
Failure:		Action:	
Est Down:		Downtime:	
OS Date,Time:		RS Date,Time:	
Safety Procs:		PM Desc:	

EQUIPMENT INFORMATION

Equipment:	BLDG-58	TANK FARM AND OFFLOAD BAY AREA-58
Eqp Hier:	BLDG-58	Serial #:
Location:		Model #:
Keyword:	BUILDING-58, ALL BUILDINGS IN AREA 58	Manufacturer:

PROBLEM DESCRIPTION

T-145 HAIRLINE CRACKS IN FIRE COATING ON LEGS NEEDS REPAIRED

COMMENTS**AUTHORIZATION/COMPLETION INFORMATION**

Authorized By:	Ken Redding	Authorized:	09/02/15
Planned By:		Planned:	
Completed By:		Completed:	



Attachment 4

Area 55 and Area 50C T-Tests

T-Enclosure TEST PROCEDURE RECORD

Building 55

40 CFR - Chapter 1 Part 52 Appendix B

Procedure T-Criteria for and Verification of a Permanent or Temporary Enclosure.

2.1 Natural Draft Opening (NDO) : one 24" x 24" located on west wall of North side bump out over man door.

2.2 Building is a Permanent Total Enclosure (PTE)

3.1 Equivalent diameter of NDO = 27" and distance from nearest VOC Emitting Point is 144" so $144"/27" = 5.33 > 4$ diameter from point of emitting. Location is good.

5.1 Nearest exhaust duct suction point is 168" from NDO so $168"/27" = 6.22 > 4.0$ diameters. Location is good.

5.2 Measure the total Area of the enclosure (A) and the total Area (AN) of the NDOs. Calculate the NDO to enclosure ration (NEAR) as follows

$NEAR = AN/A$ NEAR must be < 0.05

(calculation of the building total surface area is not needed here since by inspection the floor area and roof areas alone at 60' x 100' = 12,000 ft² so the NEAR just using the areas would be 0.0003 < 0.05 so OK.

5.3 TEST DATA

Readings		Recordings	Comments:
Temperature	89 ° F		All doors closed to the building.
Wind	NW 7 MPH		Other building openings noted during testing: Drum conveyor Door not 100% closed
Direct Reading	351	FPM>200FPM?	
If Direct Reading FPM is >200FPM then OK.			
Equipment			
TSI Inc VELOCICALC PLUS Model 8386A Serial Number:			55040289

5.4 Verify that the direction of airflow is inward through all NDO's. Monitor the direction of airflow at intervals of at least 10 minutes for at least one hour. Used strip of plastic on a brazing rod to observe pull into louvers. Checked 6 x 10 minutes. All inward flows. Completed test

Name	Darren Ratzlaff	Date	9-1-15
------	-----------------	------	--------

T-Enclosure TEST PROCEDURE RECORD
Building 50
40 CFR - Chapter 1 Part 52 Appendix B

Procedure T-Criteria for and Verification of a Permanent or Temporary Enclosure.

2.1 Natural Draft Opening (NDO) : one 24" x 24" located on west wall over man door.

2.2 Building is a Permanent Total Enclosure (PTE)

3.1 Equivalent diameter of NDO = 27" and distance from nearest VOC Emitting Point is 162" so $162"/27" = 6.0 > 4$ diameter from point of emitting. Location is good.

5.1 Nearest exhaust duct suction point is 252" from NDO so $252"/27" = 9.33 > 4.0$ diameters. Location is good.

5.2 Measure the total Area of the enclosure (A) and the total Area (AN) of the NDOs. Calculate the NDO to enclosure ration (NEAR) as follows

$NEAR = AN/A$ NEAR must be < 0.05

(calculation of the building total surface area is not needed here since by inspection the floor area and roof areas alone at $32' \times 140' = 8,960 \text{ ft}^2$ so the NEAR just using the areas would be $0.0003 < 0.05$ so OK.

5.3 TEST DATA

Readings		Recordings	Comments:
Temperature		81°F	All doors closed to the building.
Wind		NNW @ 9 mph	Other building openings noted during testing:
Direct Reading	354	FPM>200FPM?	
If Direct Reading FPM is >200FPM then OK.			
Equipment			
TSI Inc VELOCICALC PLUS Model 8386A Serial Number:			55040289

5.4 Verify that the direction of airflow is inward through all NDO's. Monitor the direction of airflow at intervals of at least 10 minutes for at least one hour. Used strip of plastic on a brazing rod to observe pull into louvers. Checked 6 x 10 minutes. All inward flows. Completed test

Name	<i>Rick Olson</i>	Date	9.02.15
------	-------------------	------	---------



Attachment 5

CH1033000 SDS

Material Safety Data Sheet

ECOLAB

KX-1077

Section 1. Chemical product and company identification

Trade name : KX-1077
Product use : Cleaning product
Supplier : Ecolab Inc. Food & Beverage Division
370 N. Wabasha Street
St. Paul, MN 55102
1-800-392-3392

Code : 903613
Date of issue : 27-September-2007

EMERGENCY HEALTH INFORMATION: 1-800-328-0026
Outside United States and Canada CALL 1-851-222-5352 (In USA)

Section 2. Composition, information on ingredients

<u>Name</u>	<u>CAS number</u>	<u>% by weight</u>
phosphoric acid	7664-38-2	26
sulphuric acid	7664-93-9	5
dodecylbenzenesulfonic acid	27176-87-0	2
xylenesulfonic acid, sodium salt	1300-72-7	1 - 5
alcohols, c10-14, ethoxylated	66455-15-0	1 - 5

Section 3. Hazards identification

Physical state : Liquid. [Liquid.]
Emergency overview : DANGER!

CAUSES RESPIRATORY TRACT, EYE AND SKIN BURNS.
HARMFUL IF SWALLOWED.

Do not ingest. Do not get in eyes, on skin or on clothing. Do not breathe vapor or mist.
Keep container closed. Use only with adequate ventilation. Wash thoroughly after handling.

Potential acute health effects

Eyes : Corrosive to eyes.
Skin : Corrosive to the skin.
Inhalation : Corrosive to the respiratory system.
Ingestion : Harmful if swallowed. Causes burns to mouth, throat and stomach.

See toxicological information (section 11)

Section 4. First aid measures

Eye contact : In case of contact, immediately flush eyes with cool running water. Remove contact lenses and continue flushing with plenty of water for at least 15 minutes. Get medical attention immediately.

Skin contact : In case of contact, immediately flush skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Wash clothing before reuse. Clean shoes thoroughly before reuse. Get medical attention immediately.

Inhalation : If inhaled, remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Get medical attention immediately.

Ingestion : Rinse mouth; then drink one or two large glasses of water. Do not induce vomiting. Never give anything by mouth to an unconscious person. Get medical attention immediately.

Section 5. Fire fighting measures

- Flash point** : > 100°C
Product does not support combustion.
- Fire-fighting media and instructions** : Use an extinguishing agent suitable for the surrounding fire.
Dike liquid for later disposal.
No specific hazard.
- Special protective equipment for fire-fighters** : Fire-fighters should wear appropriate protective equipment and self-contained breathing apparatus (SCBA) with a full face-piece operated in positive pressure mode.

Section 6. Accidental release measures

- Personal precautions** : Ventilate area of leak or spill. Do not touch damaged containers or spilled material unless wearing appropriate protective equipment (Section 8). Stop leak if without risk. Do not allow to enter drains or watercourses.
- Environmental precautions** : Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers. Inform the relevant authorities if the product has caused environmental pollution (sewers, waterways, soil or air).
- Methods for cleaning up** : If emergency personnel are unavailable, contain spilled material. For small spills, add absorbent (soil may be used in the absence of other suitable materials), scoop up material and place in a sealable, liquid-proof container for disposal. For large spills, dike spilled material or otherwise contain material to ensure runoff does not reach a waterway. Place spilled material in an appropriate container for disposal.

Section 7. Handling and storage

- Handling** : Do not ingest. Do not get in eyes or on skin or clothing. Do not breathe vapor or mist. Keep container closed. Use only with adequate ventilation. Wash thoroughly after handling. Do not mix with bleach or other chlorinated products – will cause chlorine gas.
- Storage** : Keep out of the reach of children. Keep container tightly closed. Keep container in a cool, well-ventilated area.
Store between the following temperatures: -30 and 50°C

Section 8. Exposure controls, personal protection

- Engineering measures** : Use only with adequate ventilation. If user operations generate dust, fumes, gas, vapor or mist, use process enclosures, local exhaust ventilation or other engineering controls to keep worker exposure to airborne contaminants below any recommended or statutory limits. Provide eyewash and safety shower in area if contact or splash hazard exists.

Personal protection :

- Eyes** : Use chemical splash goggles. For continued or severe exposure wear a face shield over the goggles.
- Hands** : Use chemical-resistant, impervious gloves.
- Skin** : Use synthetic apron, other protective equipment as necessary to prevent skin contact.
- Respiratory** : Wear appropriate respirator when ventilation is inadequate and occupational exposure limits are exceeded.

Name

phosphoric acid

Exposure limits

ACGIH TLV (United States, 1/2006).

STEL: 3 mg/m³ 15 minute(s).

TWA: 1 mg/m³ 8 hour(s).

OSHA PEL (United States, 11/2006).

TWA: 1 mg/m³ 8 hour(s).

sulphuric acid

ACGIH TLV (United States, 1/2006).

TWA: 0.2 mg/m³ 8 hour(s).

OSHA PEL (United States, 11/2006).

TWA: 1 mg/m³ 8 hour(s).

Section 9. Physical and chemical properties

Physical state	: Liquid. [Liquid.]
Color	: Colorless to light yellow.
Odor	: Faint odor.
pH	: 0.7 to 1.7 [Conc. (% w/w): 100%]
Boiling/condensation point	: >35°C (>95°F)
Specific gravity	: 1.205 to 1.225
Solubility	: Easily soluble in cold water, hot water.

Section 10. Stability and reactivity

Stability	: The product is stable.
Reactivity	: Extremely reactive or incompatible with alkalis. Reactive with metals. Slightly reactive to reactive with organic materials. Do not mix with bleach or other chlorinated products -- will cause chlorine gas.

Section 11. Toxicological information

Potential acute health effects

Eyes	: Corrosive to eyes.
Skin	: Corrosive to the skin.
Inhalation	: Corrosive to the respiratory system.
Ingestion	: Harmful if swallowed. Causes burns to mouth, throat and stomach.

Potential chronic health effects

Chronic effects on humans	: Contains material which causes damage to the following organs: lungs, mucous membranes, upper respiratory tract, stomach, teeth.
---------------------------	--

Section 12. Ecological information

Section 13. Disposal considerations

Waste disposal	: The generation of waste should be avoided or minimized wherever possible. Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers. Disposal of this product, solutions and any by-products should at all times comply with the requirements of environmental protection and waste disposal legislation and any regional local authority requirements.
Waste classification	: Unused product is D002 (Corrosive)
Consult your local or regional authorities.	

Section 14. Transport information

Regulatory Information	UN number	Proper shipping name	Class	Packing group	Additional information
DOT Classification	UN3264	Corrosive liquid, acidic, inorganic, n.o.s. (Phosphoric acid and Sulfuric acid)	8	II	Not available.

APPLIES ONLY DURING ROAD TRANSPORT

Any variation of the shipping description based on the packaging is not addressed.

Section 15. Regulatory information

HCS Classification : Corrosive material
Target organ effects

U.S. Federal regulations : SARA 302/304/311/312 extremely hazardous substances: sulphuric acid
SARA 302/304 emergency planning and notification: sulphuric acid

TSCA 8(b) inventory : All materials are listed or exempt.

SARA 313 **Product name** **Concentration**
Form R - Reporting requirements : sulphuric acid 4.685 - 4.71

California Prop. 65 : No products were found.

Section 16. Other information

Hazardous Material :
Information System (U.S.A.)

Health	3
Flammability	0
Physical hazards	0

Date of Issue : 27-September-2007.
Responsible name : Regulatory Affairs
Date of previous issue : 27-September-2007.

Notice to reader

The above information is believed to be correct with respect to the formula used to manufacture the product in the country of origin. As data, standards, and regulations change, and conditions of use and handling are beyond our control, NO WARRANTY, EXPRESS OR IMPLIED, IS MADE AS TO THE COMPLETENESS OR CONTINUING ACCURACY OF THIS INFORMATION.

ORIGIN ID: BFFA (308) 235-8212
KELLY WHITTLESEY
2247 SOUTH HIGHWAY 71
KIMBALL, NE 68145
UNITED STATES US

SHIP DATE: 02SEP15
ACTWGT: 1.00 LB
CAD: 106186637/INCT3670

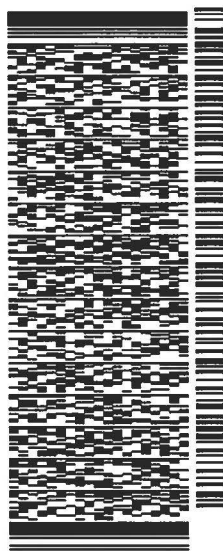
BILL SENDER

TO MS. DEDRIEL NEWSOME
EPA REGION VII
300 MINNESOTA AVENUE

KANSAS CITY KS 66101

REF: (913) 551-7049
INV

DEPT



J152015052501ur

TRK# 7744 2796 8411
0201

THU - 03 SEP AA
STANDARD OVERNIGHT

XH KCKA

66101
KS-US MCI



After printing this label:

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.